

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TRAXCELL TECHNOLOGIES, LLC.,)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	
CELLCO PARTNERSHIP,)	
Defendant.)	

DECLARATION OF MARK JEFFERSON REED

1. My name is Mark Jefferson Reed. I am over the age of 21. I have personal knowledge of the facts contained herein, which are true and correct. If called as a witness, I could competently testify to these statements.

2. I am a co-inventor of U.S. Pat. No. 8,977,284 and all patents that depend therefrom. I am also a co-manager of Traxcell Technologies, LLC (“Traxcell”).

3. In addition to its patents, Traxcell has several pending causes of action, including:

- a. The April Trial;
- b. Traxcell Technologies, LLC v. GoShare, Inc., 6:2022cv00943;
- c. Traxcell Technologies, LLC v. AfterShip, Inc., 6:2022cv00929;
- d. Traxcell Technologies, LLC v. Lyft, Inc., 6:2022cv00689;
- e. Traxcell Technologies, LLC v. Grubhub, Inc., 6:2022cv00690;
- f. Traxcell Technologies, LLC v. Cellco Partnership et al., 6:2022cv00976;
- g. Traxcell Technologies, LLC v. T-Mobile USA, Inc. et al., 6:2022cv00991; and, Traxcell Technologies, LLC v. T-Mobile USA, Inc. et al., 6:2022cv00992 (collectively, “Traxcell’s Causes of Action”).

4. After Traxcell was Ordered to pay the Verizon Fee Award, Traxcell was forced into bankruptcy to try and save its business and Traxcell’s Causes of Action. However, Traxcell was unsuccessful in bankruptcy. Traxcell has depleted its resources after receiving the Verizon Fee Award.

5. The Verizon Fee Award has stopped all of Traxcell's Causes of Action. Absent relief of the Verizon Fee Award, Traxcell's Causes of Action will be lost either to the receiver or otherwise. Absent extraordinary relief by this Court, Traxcell will likely not be able to proceed with any of its causes of action. Traxcell has been gravely damaged by the void Verizon Fee Award. Traxcell has already paid \$100,000 as a bond to stay execution of the Verizon Fee Award (and Sprint Fee Award), as reflected by Exhibit N to the Original Complaint in this matter, a true and correct copy of the clerk's notice approving bond.

6. Traxcell is solely owned by my wife, Joyce Ann Reed and myself. My wife and I solely funded the development and prosecution of the inventions contained in these 12 Patents. There are no outside investors in Traxcell.

7. Traxcell's Patents include some fundamental inventions in wireless technology including (1) the invention of the automated network tuning system that help prevent dropped calls and saves wireless networks money by having less engineers to manually field test and tune the wireless network, and (2) Traxcell's inventions also the cover navigation maps being displayed on wireless devices and allowing users to find the fastest driving in order to save time with the best route avoid traffic congestion.

8. All of the Traxcell Inventions were created by myself and my Co-Inventor, Stephen Michael Palik. Mr. Palik has a 20% interest in any Net-Net-Net profits that may come from Traxcell's inventions. Mr. and Mrs. Reed retain the remaining 80% of any Net-Net-Net profit by Traxcell.

9. It is Traxcell's intention to pay any valid judgments that may be due. However, Traxcell is currently appealing the validity of the judgments against Traxcell on the grounds that

the judgments were improperly imposed on Traxcell after the matter was already settled by the Eastern District of Texas Federal Court.

10. Traxcell has assigned its Patents to Traxcell Technologies II, LLC, an independently owned company. This assignment was made in an effort to protect Traxcell's intellectual property rights, to generate income in order to pay Traxcell's bills, and to enable the filing of lawsuits against Patent infringers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in black ink that reads "Mark Jeff Reed". The signature is written in a cursive, flowing style.

Executed on November 25, 2024.

/s/ Mark Jefferson Reed
Mark Jefferson Reed